1 2	NICHOLAS A. TRUTANICH United States Attorney Nevada Bar Number 13644				
3	JARED L. GRIMMER Assistant United States Attorney District of Nevada 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 (702) 388-6336 jared.l.grimmer@usdoj.gov Attorneys for the United States				
4					
5					
6					
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA				
8					
9	UNITED STATES OF AMERICA,	Case No.: 2:19-cr-00019-MMD-NJK			
11	Plaintiff,	Joint Stipulation to Continue Government's Response to Defendant's			
12	v. JULIO CESAR GARCIA-CUEVAS,	Motion to Dismiss (ECF No. 26), and Defendant's Reply			
	, '	1 J			
13	Defendant.	(First Request)			
13 14	Defendant.	(First Request)			
	Defendant. IT IS HEREBY STIPULATED AND A	• •			
14		GREED, by and between Nicholas A.			
14 15	IT IS HEREBY STIPULATED AND A	GREED, by and between Nicholas A. Grimmer, Assistant United States			
14 15 16	IT IS HEREBY STIPULATED AND A Trutanich, United States Attorney, and Jared L.	GREED, by and between Nicholas A. Grimmer, Assistant United States ica, Rene L. Valladares, Federal Public			
14 15 16 17	IT IS HEREBY STIPULATED AND A Trutanich, United States Attorney, and Jared L. Attorney, counsel for the United States of Amer	GREED, by and between Nicholas A. Grimmer, Assistant United States ica, Rene L. Valladares, Federal Public l Public Defender, counsel for Julio Cesar			
14 15 16 17 18	IT IS HEREBY STIPULATED AND A Trutanich, United States Attorney, and Jared L. Attorney, counsel for the United States of Amer Defender, and Andrew Wong, Assistant Federa	GREED, by and between Nicholas A. Grimmer, Assistant United States ica, Rene L. Valladares, Federal Public l Public Defender, counsel for Julio Cesar to defendant's motion to dismiss (ECF No.			
14 15 16 17 18 19 20 21	IT IS HEREBY STIPULATED AND A Trutanich, United States Attorney, and Jared L. Attorney, counsel for the United States of Amer Defender, and Andrew Wong, Assistant Federa Garcia-Cuevas, that the government's response	GREED, by and between Nicholas A. Grimmer, Assistant United States ica, Rene L. Valladares, Federal Public l Public Defender, counsel for Julio Cesar to defendant's motion to dismiss (ECF No. cated and continued to July 23, 2019, with			
14 15 16 17 18 19 20 21 22	IT IS HEREBY STIPULATED AND A Trutanich, United States Attorney, and Jared L. Attorney, counsel for the United States of Amer Defender, and Andrew Wong, Assistant Federa Garcia-Cuevas, that the government's response 26) currently due on Friday, July 5, 2019, be vac defendant's corresponding reply due on July 30, This Stipulation is entered into for the for	GREED, by and between Nicholas A. Grimmer, Assistant United States ica, Rene L. Valladares, Federal Public I Public Defender, counsel for Julio Cesar to defendant's motion to dismiss (ECF No. cated and continued to July 23, 2019, with 2019. Illowing reasons:			
14 15 16 17 18 19 20 21	IT IS HEREBY STIPULATED AND A Trutanich, United States Attorney, and Jared L. Attorney, counsel for the United States of Amer Defender, and Andrew Wong, Assistant Federa Garcia-Cuevas, that the government's response 26) currently due on Friday, July 5, 2019, be vac defendant's corresponding reply due on July 30, This Stipulation is entered into for the for	GREED, by and between Nicholas A. Grimmer, Assistant United States ica, Rene L. Valladares, Federal Public l Public Defender, counsel for Julio Cesar to defendant's motion to dismiss (ECF No. cated and continued to July 23, 2019, with 2019. llowing reasons: need additional time to properly respond			

1	2.	Government counsel has re	equested a copy of records from the defendant		
2	Immigration Court proceeding, and understands that it may be received within				
3	approximate	ely three weeks of today's da	te. These records may be dispositive of the		
4	current motion.				
5	3.	Denial of this request for co	ontinuance could result in a miscarriage of		
6	justice.				
7	4.	This is the first request for o	continuance of the government response to		
8	defendant's motion to dismiss.				
9					
10	DATED this	1st day of July, 2019.			
11					
12	1	ALLADARES olic Defender	NICHOLAS A. TRUTANICH United States Attorney		
13	rederar r de	one Detender	Cinica states ratemas		
14	By <u>/s/ Andr</u>	rew Wong	By <u>/s/ Jared L. Grimmer</u>		
15	ANDREW WONG		JARED L. GRIMMER Assistant United States Attorney		
16	Assistant Fe	ederal Public Defender	Assistant Office States Attorney		
17					
18					
19					
20					
21					
22					
23					
24					

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

1

2	DISTRICT OF NEVADA		
3	UNITED STATES OF AMERICA,		
4	Plaintiff,	Case No.:2: 19-cr-00019-MMD-NJK	
5	v.		
6	JULIO CESAR GARCIA-CUEVAS,		
7	Defendant.		
8			
9			
10	IT IS THEREFORE ORDERED that the government's response to defendant's		
11	motion to dismiss (ECF No. 26) currently due on Friday, July 5, 2019, be vacated and		
12	continued to July 23, 2019, with defendant's corresponding reply due on July 30, 2019.		
13			
14	DATED this 8th day of July, 2019.		
15			
16	UNI	TED STATES MAGISTRATE JUDGE	
17			
18			
19			
20			
21			
22			
23			
24			